

DAVIS POLK & WARDWELL LLP
450 Lexington Avenue
New York, New York 10017
Telephone: (212) 450-4000
Facsimile: (212) 701-5800
Timothy Graulich, Esq.
James I. McClammy, Esq.
David Schiff, Esq.
Joshua Sturm, Esq.

Counsel to the Foreign Representative

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

Andrade Gutierrez Engenharia S.A.,¹

Debtors in a Foreign Proceeding

Chapter 15

Case No. 22-11425 (MG)

(Jointly Administered)

**NOTICE OF HEARING ON FOREIGN REPRESENTATIVE’S MOTION PURSUANT
TO 11 U.S.C. §§ 105(a), 1507(a), 1521(a),
AND 1525(a) (I) ENFORCING THE BRAZILIAN EJ PLAN
AND (II) GRANTING RELATED RELIEF**

PLEASE TAKE NOTICE that on November 18, 2022, Gustavo Braga Mercher Coutinho (the “Foreign Representative”), the authorized foreign representative in respect of the *recuperação extrajudicial* proceeding (the “Brazilian EJ Proceeding”) of Andrade Gutierrez Engenharia S.A. (“AGE”) and its affiliated debtors, AG Construções e Serviços S.A. (“AGCS”), Andrade Gutierrez Investimentos em Engenharia S.A. (“AGIE”), Andrade Gutierrez

¹ The debtors in these chapter 15 cases (the “Chapter 15 Cases”), along with each Debtor’s tax identification or corporate registry number, are: Andrade Gutierrez Engenharia S.A. (Brazil – No. 17.262.213/0001-94) (“AGE”), AG Construções e Serviços S.A. (Brazil – No. 39.469.291/0001-05) (“AGCS”), Andrade Gutierrez Investimentos em Engenharia S.A. (Brazil – No. 17.027.611/0001-26) (“AGIE”), Andrade Gutierrez International S.A. (Brazil – No. 20.253.172/0001-84) (“AGI”), and Zagope Sgps, S.A. (Portugal – No. 507403177) (“Zagope”).

International S.A. (“AGI”), and Zagope Sgps, S.A. (“Zagope”) (collectively, the “Debtors”) in the 1st Corporate Court of the Judicial Venue of Belo Horizonte (the “Brazilian Court”) pursuant to Brazilian Federal Law No. 11,101 of February 9, 2005 (as amended, the “Brazilian Bankruptcy Law”), of the laws of the Federative Republic of Brazil (“Brazil”), filed the *Foreign Representative’s Motion for Order Pursuant to 11 U.S.C. §§ 105(a), 1507(a), 1521(a), and 1525(a) (I) Enforcing the Brazilian EJ Plan and (II) Granting Related Relief* [ECF No. 31] (the “Motion”),² with the Bankruptcy Court for the Southern District of New York (the “Court”).

PLEASE TAKE FURTHER NOTICE that any objection or other response to the Motion must be made in accordance with the Bankruptcy Code, the Local Rules of the United States Bankruptcy Court for the Southern District of New York, and the Bankruptcy Rules, in a writing that sets forth the basis for such objection with specificity and the nature and extent of the respondent’s claims against the Debtors. Any such objection must be filed electronically with the Court on the Court’s electronic case filing system in accordance with and except as provided in General Order M-399 (a copy of which may be viewed on this Court’s website at www.nysb.uscourts.gov) and the Court’s procedures for the filing, signing, and verification of documents by electronic means, and served upon the Foreign Representative’s counsel, Davis Polk & Wardwell LLP, 450 Lexington Avenue, New York, New York 10017 (Attn: Timothy Graulich, James I. McClammy, David Schiff, and Joshua Sturm), so as to be received by **November 28, 2022, at 4:00 p.m. (prevailing Eastern Time)** (the “Objection Deadline”), with a hard copy served upon the Chambers of the Honorable Martin Glenn, United States Bankruptcy Judge, United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York 10004-14108.

² Capitalized terms used by not defined herein shall have meanings ascribed to such terms in the Motion.

PLEASE TAKE FURTHER NOTICE that a hearing to consider the relief requested in the Motion will be held via Zoom for Government before the Honorable Judge Martin Glenn, United States Bankruptcy Judge, at the Court, One Bowling Green, New York, NY 10004, Courtroom 523, on **December 2, 2022 at 2:00 p.m. (prevailing Eastern Time)**.

PLEASE TAKE FURTHER NOTICE that because Zoom for Government will be used for this hearing, parties are required to make an eCourt Appearance for the hearing by 4 p.m. (prevailing Eastern Time) the business day before the hearing (*i.e.*, Thursday, December 1, 2022 by 4:00 p.m. (prevailing Eastern Time)). Information regarding zoom hearings and eCourt Appearance before the Honorable Judge Martin Glenn is available on the Court's webpage at: <http://www.nysb.uscourts.gov/content/judge-martin-glenn>.

PLEASE TAKE FURTHER NOTICE that the Motion, which is set to be heard at the hearing, may be obtained free of charge by visiting the website of Epiq Corporate Restructuring, LLC at <https://dm.epiq11.com/case/andrade/info>. You may also obtain copies of any pleadings by visiting the Court's website at <http://www.nysb.uscourts.gov> in accordance with the procedures and fees set forth therein.

Dated: November 18, 2022
New York, New York

/s/ Timothy Graulich
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